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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

BIG3 LLC, a limited liability company;
O'Shea Jackson a/k/a Ice Cube, an
individual; and Jeff Kwatinetz, an
individual;

Plaintiffs,

v.

Ahmed Al-Rumaihi, an individual;
Faisal Al-Hamadi, an individual;
Ayman Sabi, an individual; Sheikh
Abdullah bin Mohammed bin Sau Al
Thani, an individual and as CEO of
Qatar Investment Authority; DOES 1-
100

Defendants.

CASE NO. 2:18-cv-3466

**DECLARATION OF AHMED AL-
RUMAIHI IN SUPPORT OF
NOTICE OF REMOVAL OF
CIVIL ACTION PURSUANT TO
28 U.S.C. §§ 1332, 1441, AND 1446**

FAC Filed: April 6, 2018

Hearing Date:

Time:

I, Ahmed Al-Rumaihi, declare as follows in support of removal:

1. I have direct and personal knowledge of the facts set forth herein based
on my recollection, personal experience, and my review of business records related

1 to this case, and, if called and sworn as a witness, I could and would competently
2 testify to the fact set forth herein.¹

3 2. I am one of three members of Sport Trinity, LLC (“Sport Trinity”), a
4 limited liability company organized under the laws of the state of Delaware. The
5 other two members of Sport Trinity are Ayman Sabi and Faisal Al-Hamadi.

6 3. Faisal Al-Hamadi, Sheikh Abdullah bin Mohammed bin Sau Al Thani,
7 and Akbar Al Baker are, and always have been, citizens of Qatar. To my
8 knowledge, they are not, and never have been, lawful permanent residents of the
9 United States or domiciled anywhere in the United States.

10 4. I am, and always have been, a citizen of Qatar, where I have
11 established my permanent home and intend to remain indefinitely. I understand
12 Qatar to be my domicile.

13 5. I am not, and never have been, a United States citizen or domiciled
14 anywhere in the United States.

15 6. Although I am a holder of a B-1 visa, I am not, and never have been, a
16 lawful permanent resident of the United States.

17 7. Although my family and I have recently leased rental properties in
18 California, I typically stay in New York City, New York and Washington, D.C.
19 when visiting and working in the United States.

20 8. I am not, and never have been, a permanent resident of the state of
21 California, the state of New York, or the District of Columbia, nor have I ever
22 considered California, New York, or the District of Columbia to be my domicile.

23 9. Sport Trinity has never been affiliated in any way with BIG3 LLC.

24 10. I personally have never been affiliated in any way with BIG3 LLC.

25 11. To my knowledge, no other defendant in this action has ever been
26 affiliated with BIG3 LLC.

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28 ¹ Capitalized terms not defined herein have the meaning attributed to them in
the Notice of Removal.

1 12. On July 14, 2017 Sport Trinity made a substantial investment in BIG3
2 Basketball LLC to obtain a 15.03% membership interest in the company. At that
3 time, I was designated by Sport Trinity as a member of the Board of Managers for
4 BIG3 Basketball LLC. Ayman Sabi was designated as a Board Observer of BIG3
5 Basketball LLC.

6 13. Since before the Complaint was filed in the Superior Court of
7 California on April 5, 2018, BIG3 Basketball LLC and its members have purported
8 to oust Sport Trinity from the company. Since that time, BIG3 Basketball LLC has
9 maintained that Sport Trinity never had any membership interest in the company,
10 that I am not a member of the Board of Managers, and that Ayman Sabi is not a
11 Board Observer.

12 14. On April 6, 2018, Sport Trinity served a demand for books and records
13 on BIG3 Basketball LLC, which was signed by Ayman Sabi and me. The demand
14 included Sport Trinity's grievances against the BIG3 Basketball LLC, including the
15 gross mismanagement and erratic behavior of plaintiff Jeff Kwatinetz.

16 15. On April 11, 2018, BIG3 Basketball LLC responded to Sport Trinity's
17 demand by refusing Sport Trinity's request to access books and records of the
18 company claiming that Sport Trinity "(1) owns no Class A Units in BIG3 and (2) is
19 not a member of BIG3."

20 16. I consent to and join in the removal of the Superior Court action to
21 federal court.

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2 I declare under the penalty of perjury and under the laws of the United States
3 of America that the foregoing is true and correct.
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5 Executed this 24th day of April, 2018, at LA, CA.
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9 Ahmed Al-Rumaihi
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